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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

FILED

2013 JUN 12 AM 10:23

WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE

UNITED STATES OF AMERICA

§ **INDICTMENT**

v.

§ **COUNTS ONE and TWO: 18 U.S.C. §**
§ **666(a)(2), Paying a Bribe to an Agent of an**
§ **Organization Receiving Federal Funds;**
§
§
§

SALVADOR CASTILLON

DR 13 CR 0828

THE GRAND JURY CHARGES:

At All Times Material To This Indictment:

1. SALVADOR CASTILLON operated a construction company in Maverick County, Texas called South Texas Concrete.
2. Maverick County's arrangement with contractors who provided labor was that the contractor would receive an initial payment, often times up to fifty percent of the project's cost, to commence work. When the project was complete the contractor would submit an invoice indicating the project was finished and then the remainder of the funds would be paid.
3. In 2010 SALVADOR CASTILLON was awarded construction contracts in Maverick County for which he was paid \$416,800.
4. In 2011 SALVADOR CASTILLON was awarded construction contracts in Maverick County for which he was paid \$148,000.
5. SALVADOR CASTILLON was awarded those contracts because he had entered into an arrangement with MAVERICK COUNTY COMMISSIONER whereby he would pay

MAVERICK COUNTY COMMISSIONER between \$3,000 to \$5,000 for every Maverick County contract he was awarded. In return, MAVERICK COUNTY COMMISSIONER ensured that SALVADOR CASTILLON was awarded the contracts.

COUNT ONE

[18 U.S.C. § 666(a)(2)]

6. Paragraphs One through Five above are realleged and incorporated by reference as if fully set forth herein.

7. At all times material to this indictment Maverick County, Texas was a local government that received in the one year period beginning on January 1, 2010 benefits in excess of \$10,000 under Department of Homeland Security Grant Program Operation Stonegarden.

8. Between on or about February 2, 2010 and on or about December 31, 2010 in the Western District of Texas, the Defendant,

SALVADOR CASTILLON

did corruptly give, offer, and agree to give a thing of value to COUNTY COMMISSIONER, who was an agent or employee of Maverick County, intending to influence and reward COUNTY COMMISSIONER in connection with a transaction and series of transactions of Maverick County involving \$5,000 or more, in violation of 18 U.S.C. § 666(a)(2).

COUNT TWO

[18 U.S.C. § 666(a)(2)]

9. Paragraphs One through Five above are realleged and incorporated by reference as if fully set forth herein.

10. At all times material to this indictment Maverick County, Texas was a local government that received in the one year period beginning on January 1, 2011 benefits in excess of \$10,000 under Department of Homeland Security Grant Program Operation Stonegarden.

11. Between on or about January 12, 2011 and on or about March 31, 2011 in the Western District of Texas, the Defendant,

SALVADOR CASTILLON

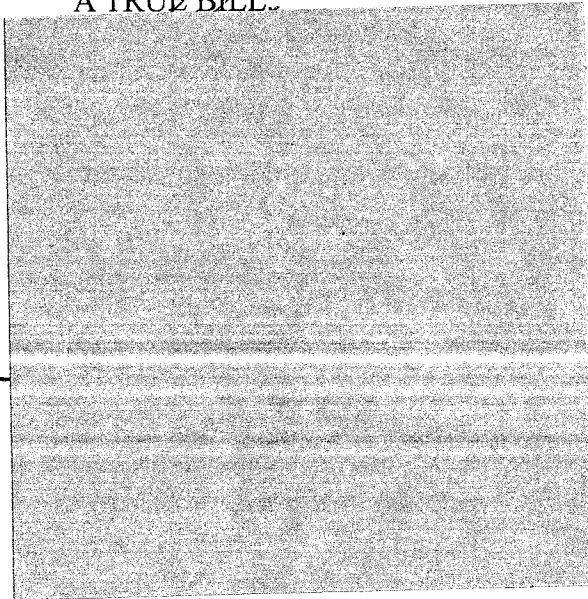
did corruptly give, offer, and agree to give a thing of value to COUNTY COMMISSIONER, who was an agent or employee of Maverick County, intending to influence and reward COUNTY COMMISSIONER in connection with a transaction and series of transactions of Maverick County involving \$5,000 or more, in violation of 18 U.S.C. § 666(a)(2).

A TRUE BILL.

ROBERT PITMAN
United States Attorney

By: _____

MICHAEL C. GALDO
Assistant United States Attorney



SEALED:
UNSEALED: XX

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

COUNTY: Maverick

USAO #:

DATE: June 12, 2013

MAG. CT. #: MATTER

DR 13 CR 0828

AUSA: MICHAEL C. GALDO

DEFENDANT: SALVADOR CASTILLON

CITIZENSHIP: U.S. Citizen

INTERPRETER NEEDED: No Language: English/Spanish

DEFENSE ATTORNEY: N/A

ADDRESS OF ATTORNEY: N/A

DEFENDANT IS: [REDACTED] DATE OF ARREST: N/A

BENCH WARRANT NEEDED: [REDACTED]

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: SEALED INDICTMENT

OFFENSE: (Code & Description): Counts 1-2: 18 U.S.C. § 666 – Paying Bribe To An Agent of Organization Receiving Federal Funds.

OFFENSE IS A: FELONY

MAXIMUM SENTENCE: Counts 1-2: up to 10 years imprisonment; a \$250,000 fine; 3 years of supervised release; and a \$100 special assessment on all counts.

PENALTY IS MANDATORY: YES & NO

REMARKS: See above W/DT-CR-3